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April 13, 2017

Honorable Judge John J. McConnell, Jr.
Federal Building and Courthouse
One Exchange Terrace
Providence, RI 02903

Re: *Martinez, et al. v. Alfa Laval, et al.*
Case No.: 1:16-cv-00619-M-LDA

Dear Judge McConnell:

I write as counsel for the Plaintiff, Sandra Martinez ("Plaintiff"), in the above referenced matter. Plaintiff hereby requests permission from this Honorable Court to dismiss all remaining defendants ("Defendants") by stipulation and without prejudice pursuant to Fed.R.Civ.P. 41(a) in anticipation of filing a similar action in Plaintiff's state of residence, New York.

The above referenced matter was filed in Rhode Island Superior Court on September 15, 2016 by Plaintiff and her husband, Aurelio Martinez (collectively, "Plaintiffs"), alleging asbestos-related injuries resulting from Aurelio Martinez's occupational asbestos exposure. Aurelio Martinez was diagnosed with mesothelioma in May 2016 and died from his asbestos-related injuries on October 3, 2016. Plaintiffs' counsel at the time this matter was filed in Rhode Island Superior Court was Bern Ripka LLC.

On December 30, 2017, Plaintiff sent a certified letter to Bern Ripka LLC terminating their attorney-client relationship effective immediately.¹ Bern Ripka LLC, n/k/a Marc J. Bern & Partners, does not dispute or object to the termination of their attorney-client relationship by Plaintiff Martinez. I am currently representing Plaintiff in this matter.

Plaintiff's intention is to follow the advice of her attorney and dismiss all remaining Defendants in the above referenced matter without prejudice in anticipation of filing similar allegations in her state of residence, New York.

¹ Plaintiff's reasons for terminating Bern Ripka LLC will be provided upon request by this Honorable Court.

Counsel for Plaintiff has conferred with acting Defendants' Liaison Counsel, David A. Goldman of CMBG3 Law ("Mr. Goldman"), about the voluntary dismissals. Mr. Goldman has confirmed that Defendants have no objection to dismissing all Defendants without prejudice in anticipation of filing a similar action in New York.

In the event this Court grants Plaintiff's request, Plaintiff and Defendants agree that rescheduling the Rule 16(b) Conference previously scheduled for April 5, 2017 will not be necessary.

Respectfully,

/s/ Alex R. Straus_____

Alex R. Straus, Esq. (RI Bar #: 8184)

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